829/zp

Serial No.: 10/069,760

Filed: September 23, 2002

Page : 7 of 11

## **REMARKS**

Claims 1-25 are pending, with claim 1 being independent. Claim 1 has been amended to correct a clerical error so as to replace two erroneous instances of "locking means" with "locking element" as recited elsewhere in the claim. It is believed that entry of this amendment is proper under 37 CFR §1.116 and MPEP §714.12 because the amendment places the rejected claims in better form for consideration on appeal.

Applicant acknowledges with appreciate the Examiner's indication that claims 11, 15-22, 24, and 25 recite allowable subject matter.

Claims 1-6 and 23 have been rejected as being unpatentable over U.S. Patent No. 5,386,486 (Fan) in view of admitted prior art described in the background section of Fan (the background of Fan). Applicant requests withdrawal of this rejection because neither Fan, the background of Fan, nor any proper combination of the two describes or suggests a socket insert supported in a housing of a socket such that the socket insert is rotatable between first and second positions, with the socket insert being adapted to be rotated between the first and second positions by means of a plug inserted in the socket; and a coding projection of a locking element supported in the socket insert that is adapted to be arranged in a complementary coding aperture in the plug, where the socket insert is rotatable between the first and second positions when the locking element is in the release position, as recited in independent claim 1.

Fan relates to a connector system 10 including a plug connector half 12, a receptacle connector half 14, and a removable insert 44 that "fits between plug connector half 12 and receptacle connector half 14." See Fan at col. 4, line 58 to col. 5, line 52 and Figs. 1 and 4. The removable insert 44 is secured to plug connector half 12 by a locking pin 48 fitted into a locking cavity 50 of a fixed socket insert 12 of the plug connector half 12. See Fan at col. 5, lines 48-54 and Figs. 1 and 4. The plug connector half 12 includes a mating shell 16 that receives an inner mating shell 18 (which is incorrectly labeled in Fig. 1 and should be pointing to the same part that number 14 is pointing to) of the receptacle connector half 14. See Fan at col. 4, lines 62-65 and Figs. 1 and 4. The locking pin 48 includes a locking post 52 at an end that passes into the cavity 50 and engages recess seats 58, 60 in the locking cavity 50, and a screw driver slot 54 at

Serial No.: 10/069,760

Filed: September 23, 2002

Page : 8 of 11

another end to permit rotation of the locking pin 48 relative to the insert 44. See Fan at col. 5, lines 44-61 and Figs. 1 and 4.

Fan does not describe or suggest the noted features of claim 1 for at least the following reasons.

First, Fan does not describe or suggest a socket insert supported in a housing of a socket such that the socket insert is rotatable between first and second positions. The Office appears to equate Fan's removable insert 44 with the recited socket insert, Fan's mating shell 16 with the recited housing, and Fan's plug connector half 12 with the recited socket. However, Fan's removable insert 44 is not supported in the mating shell 16 of the plug connector half 12 such that the removable insert 44 is rotatable between first and second positions. Rather, Fan's removable insert 44 is placed inside of the mating shell 16 and is fixed in position by the interaction of the locking post 52 with the recess seats 58, 60 of the cavity 50 and by the interaction between the exterior of the insert 44 and the interior of the mating shell 18 of the receptacle connector half 14. See Fan at col. 6, lines 8-26 and Figs. 1 and 4. Thus, Fan's removable insert 44 is fixed when it is supported by the plug connector half 12 through the interaction between the locking post 52 and the recess seats 58, 60 of the cavity 50 and Fan's removable insert 44 is movable (and rotatable) only when it is not supported by the connector half 12.

Second, Fan does not describe or suggest the socket insert being adapted to be rotated between the first and second positions by means of a plug inserted in the socket. The Office appears to equate Fan's receptacle connector half 14 with the recited plug. However, the removable insert 44 is not adapted to be rotated between first and second positions by means of the receptacle connector half 14 inserted in the plug connector half 12. Rather, the removable insert 44 is adapted to be rotated purely by means of the screw driver slot 54, which his integral with the locking pin 48 of the insert 44. There is nothing in the receptacle connector half 14 that provides a means for rotating the removable insert 44 when the receptacle connector half 14 is inserted in the plug connector half 12. To the contrary, insertion of the receptacle connector half 14 into the plug connector half 12 prevents rotation of the removable insert 44 because the screw driver slot 54 is blocked when the receptacle connector half 14 is inserted into the plug connector half 12. See Fan at Figs. 1 and 4.

Serial No.: 10/069,760

Filed: September 23, 2002

Page : 9 of 11

Third, Fan does not describe or suggest a coding projection of a locking element supported in the socket insert, where the coding projection is adapted to be arranged in a complementary coding aperture in the plug. The Office appears to equate the locking post 52 with the recited coding projection, the locking pin 48 with the recited locking element, and the cavity 50 of the plug connector half 12 with the recited complementary coding aperture in the plug. Although the locking post 52 is inserted into the cavity 50, the cavity 50 is not a coding aperture in the receptacle connector half 14, which the Office equates with the recited plug. Rather, the cavity 50 is in the plug connector half 12, which cannot be considered to be both the recited plug and the recited socket.

Moreover, if the Office wishes to equate the plug connector half 12 with the recited plug, then the only component of Fan that could qualify as a socket is the receptacle connector half 14. However, in this case, Fan would still be deficient because the insert 44 is not adapted to be rotated between first and second positions by means of the plug connector half 12 inserted in the receptacle connector half 14. Rather, the insert 44 is immobile if the plug connector half 12 is inserted in the receptacle connector half 14. Additionally, in this case, the locking pin 48 is at its release position only when the locking post 52 is inside the cavity 50 and coupled to the recess seats 58, 60. However, the insert 44 is immobile in this release position and is not rotatable between first and second positions.

Fourth, Fan does not describe or suggest the socket insert being rotatable between the first and second positions when the locking element is in the release position, which is the position the locking element is in when the coding projection is in the coding aperture, as recited in claim 1. As discussed above, the removable insert 44 is rotatable only when the locking pin 48 is turned to remove the insert 44 from the plug connector half 12. See Fan at col. 6, lines 14-40 and Figs. 1 and 4. However, while the insert 44 is removed from the plug connector half 12, the locking post 52 is not locked in the cavity 50. See Fan at col. 6, lines 26-38 and Figs. 1 and 4. Moreover, while the locking post 52 is in the cavity 50 and locked by coupling to the recess seats 58, 60, the insert 44 is not rotatable since the locking post 52 is locked. See Fan at col. 6, lines 14-26 and Figs. 1 and 4.

829/zp

Serial No.: 10/069,760

Filed: September 23, 2002

Page : 10 of 11

Lastly, the background of Fan also fails to describe or suggest the above discussed subject matter. The background of Fan merely points out that the term pin terminus for the fiber can be a pin contact for electrical connection. See Fan at col. 1, lines 22-25.

Accordingly, for at least these reasons, claim 1 is allowable over any proper combination of Fan and the background of Fan, as are dependent claims 2-6 and 23.

Claims 7-10, which depend from claim 1, have been rejected as being unpatentable over Fan in view of U.S. Patent No. 3,525,068 (Nelson). Applicant requests reconsideration and withdrawal of this rejection because Nelson does not remedy the failure of Fan to describe or suggest the features of claim 1 discussed above.

In particular, Nelson's tumbler member 12 (which the Office appears to equate with the recited socket insert) is not supported in a housing of the socket body 11 such that the tumbler member 12 is rotatable between first and second positions and is adapted to be rotated between its positions by means of the plug body 10 inserted into the socket body 11. Rather, Nelson's tumbler member 12 is fixed when supported in the housing of the socket body 11 or when the plug body 10 is inserted into the socket body 11.

Accordingly, claim 1 is allowable over any proper combination of Fan and Nelson, as are dependent claims 7-10.

Claims 12-14, which also depend from claim 1, have been rejected as being unpatentable over Fan in view of Nelson and U.S. Patent No. 4,193,655 (Hermann). Applicant requests reconsideration and withdrawal of this rejection because Hermann does not remedy the failure of Fan to describe or suggest the features of claim 1 discussed above.

For example, in Hermann, the pin insert 18 (which the Office appears to equate with the recited socket insert) is not supported in a housing of the receptacle shell 12 (which the Office appears to equate with the recited socket) such that the pin insert 18 is rotatable between first and second positions and is adapted to be rotated between the positions by means of the strain relief and sealing assembly 26 (which the Office appears to equate with the recited plug) inserted into the receptacle shell 12. Moreover, the assembly 26 is not inserted into the receptacle shell 12. See Hermann at Figs. 1-3.

Accordingly, for at least these reasons, claim 1 is allowable over any proper combination of Fan, Nelson, and Hermann, as are dependent claims 12-14.

Serial No.: 10/069,760

: September 23, 2002 Filed

Page : 11 of 11

It is believed that no fee is due in connection with this filing. Nevertheless, please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

829/zp

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